



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

VIA UPS

FEB 27 2017

Mr. Steve Weems
Environmental Services Technician
Mount Joy Wire Corporation
1000 E. Main Street
Mount Joy, PA 17552

Re: Request for Information Pursuant to Section 3007(a) of the Resource Conservation and Recovery Act, 42 U.S.C. § 6927(a), Regarding Generation and Management of Hazardous Waste by Mount Joy Wire Corporation

Information Request - Reference No. C17-015
EPA ID No. PAD003023371

Dear Mr. Weems:

The U.S. Environmental Protection Agency, Region III ("EPA") is requesting information from Mount Joy Wire Corporation to supplement the information obtained by EPA during the inspection of the manufacturing facility located in Mount Joy, PA (herein after referred to as "Mount Joy" or the "Facility") on June 9, 2016, and to supplement the information provided in your information request letter responses ("IRL Responses"). EPA is requesting this information pursuant to the authority granted to it under Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6927(a), which provides in relevant part that "any person who generates, stores, treats, transports, disposes of, or otherwise handles or has handled hazardous wastes shall, upon request of any officer, employee or representative of the Environmental Protection Agency, duly designated by the Administrator, . . . furnish information relating to such wastes" EPA hereby requires that you furnish to EPA, within **thirty (30) calendar days** of receipt of this letter, the information requested below, including all documents responsive to such request.

For each and every request, if you have any reason to believe that there may be a person(s) who may be able to provide a more detailed or complete response to such request or may be able to provide additional responsive documents, then as a part of your response to such request, identify each such person and the additional information or documents which such person may be able to provide. Furthermore, for each and every response, if information or documents responsive to such request are not in your possession, custody or control, then as part of your response to such request, identify each person from whom such information or documents may be obtained.

Please provide a separate narrative response to each question. Precede each answer with the number of the question or letter of the subpart of the question to which it corresponds. A request for documents shall be construed as a request for any and all documents maintained by you or in your custody, control, or possession or in the possession, custody or control of any of your employees or agents, relating to the matters described below. For each copy of a document produced in response to this request, indicate on such copy, or in some other reasonable manner, the number of the request to which it responds, the current location and custodian of the original, the date such original was prepared, the person(s) who prepared the original and the date the document became effective at the Facility.

As used herein, the term "document" means: writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or daily entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phonograph records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer print outs, or other data compilations from which information can be obtained or translated.

All other terms used in this request for information that are defined in RCRA, 42 U.S.C. §§ 6901 *et seq.*, or 40 C.F.R. Parts 260-266 and 268 shall have the meanings set forth therein.

Requested Information

1. In the IRL Responses to Question #4, Mount Joy indicated that the contents of the 7 containers depicted in Photo #31 of the EPA inspection report consisted of used refractory brick and hi-temp insulation that is generated from the Facility furnace processing lines. The used refractory brick and hi-temp insulation was also determined by the Facility to be a D008 hazardous waste. Additionally, the Facility indicated that the date written on the side of each container was determined to be the generation date for the material in each of the containers. Please provide the following information regarding the content(s) of each of the 7 containers:
 - a. Indicate how long it takes to fill one of the containers with used refractory brick and hi-temp insulation from the furnace processing lines. If an exact amount of time cannot be determined, please estimate on average, how long it takes and explain the basis for such estimate.
 - b. State the exact date when each container became full. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate.

- c. State the exact date when each container was moved to the 90-Day Area. If an exact date cannot be determined, estimate the month and year, and explain the basis for such an estimate.
 - d. Does the Facility keep track of the amount of used D008 refractory brick and hi-temp insulation it generates over time? If so, (1) please explain how the Facility measures the amount of the waste generated and (2) state how often such measurements are taken, for example daily, weekly, monthly, or for some other predetermined period of time?
2. During the EPA inspection, the EPA inspector requested to review hazardous waste manifests and Land Disposal Restriction Notifications for calendar years 2013, 2014, 2015 and 2016. The EPA inspector noted that the Facility did not have a signed and returned copy of hazardous waste manifest #004549511 FLE dated 8/10/15 from the treatment, storage, and disposal facility ("TSDF"). In the IRL Responses to Question #4.h., Mount Joy provided a copy of manifest #015275882 JJK dated 9/20/16, which was not signed by the designated TSDF. With respect to hazardous waste manifests #004549511 FLE dated 8/10/15 and #015275882 JJK dated 9/20/16, please provide the following information:
- a. Submit TSDF signed and returned copies of each hazardous waste manifest.
 - b. Indicate if the Facility found the each of the signed manifests in onsite files after the inspection, or if the signed copy was retrieved from the TSDF or other off-site provider. If the signed copies were retrieved from the TSDF facility or other off-site provider, please indicate the exact date it was received.
3. In the IRL Responses to Question #11.a. & 11.b., the Facility provided a copy of a job title and job description for the "Environmental Services Technician." With respect to the "Environmental Services Technician" position at the Facility, provide the first and last name of each employee at the Facility who filled this position for the time period of March 1, 2012 up to the present, and provide the respective dates each of those employees served as the "Environmental Services Technician."

The provisions of Section 3008 of RCRA, 42 U.S.C. § 6928, authorize EPA to pursue penalties for failure to comply with or respond adequately to an information request under Section 3007(a) of RCRA. In addition, providing false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001. The information you provide may be used by EPA in administrative, civil or criminal proceedings.

Your facility is entitled to assert a claim of business confidentiality covering any part or all of the information submitted, in a manner described in 40 C.F.R. § 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with 40 C.F.R. Part 2, Subpart B. Unless a claim of business confidentiality is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to your facility.

This request for information is not subject to review by the Office of Management and Budget pursuant to the Paperwork Reduction Act, 44 U.S.C. §§ 3501-3520.

Your response must include the following signed and dated certification:

I certify that the information contained in this response to EPA's request for information and the accompanying documents is true, accurate and complete. As to the identified portions of this response for which I cannot personally verify their accuracy, I certify under penalty of law that this response and all attachments were prepared in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.

Signature: _____
Name: _____
Title: _____

Please send your response to:

Andrew Ma
US EPA Region III
Environmental Science Center
701 Mapes Road
Fort Meade, MD 20755-5350

If you have any questions concerning this matter, please contact Mr. Andrew Ma at (410) 305-3429.

Sincerely,



Carol Amend, Associate Director
Land and Chemicals Division
Office of RCRA Programs

Enclosures

cc: A. Ma (3LC32)

